

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

03-MDL-1570 (GBD)(SN)

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

IRAN NOTICE OF
AMENDMENT

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Arias, Margit	FL	USA	Arias, Adam P.	Spouse	N/A
2	Boisseau, Maria	NJ	USA	Boisseau, Larry	Spouse	N/A
3	Carroll, Toni Ann	NY	USA	Carroll, Peter J.	Spouse	N/A
4	Curia, Linda	NY	USA	Curia, Laurence	Spouse	N/A
5	Goldberg Sherer, Jodie	NJ	USA	Goldberg, Brian	Spouse	N/A
6	Hunter, Bridget	NY	USA	Hunter, Joseph G.	Personal Representative of the Estate of Joseph Hunter, deceased Parent of 9/11 Decedent Joseph G. Hunter	N/A
7	Irby, Kenneth	AL	USA	Irby, Stephanie	Personal Representative of the Estate of Frederick	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Irby, deceased Parent of 9/11 Decedent Stephanie Irby	
8	Irby, Kenneth	AL	USA	Irby, Stephanie	Personal Representative of the Estate of Agnes, deceased Parent of 9/11 Decedent Stephanie Irby	N/A
9	LaForte, Andrea	NJ	USA	LaForte, Michael P.	Child	N/A
10	LaForte, Frances A.	NJ	USA	LaForte, Michael P.	Spouse	N/A
11	LaForte, Frances A.	NJ	USA	LaForte, Michael P.	Parent and legal guardian on behalf of R.F., minor child of 9/11 Decedent Michael P. LaForte	N/A
12	LaForte, Michael	NJ	USA	LaForte, Michael P.	Child	N/A
13	Mackenzie, Lisanne	NY	USA	O'Brien, Jr., James P.	Spouse	N/A
14	Mackenzie, Lisanne	NY	USA	O'Brien, Jr., James P.	Parent and legal guardian on behalf of A.O., minor child of 9/11 Decedent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					James P. O'Brien, Jr.	
15	Maggitti, Pamela Ann	MD	USA	Maggitti, Joseph	Spouse	N/A
16	Saada Samuel, Delphine	NY	USA	Saada, Thierry	Spouse	N/A
17	Saada Samuel, Delphine	NY	USA	Saada, Thierry	Parent and legal guardian on behalf of L.S., minor child of 9/11 Decedent Thierry Saada	N/A
18	Tallon, Eileen	NY	USA	Tallon, Sean Patrick	Personal Representative of the Estate of Patrick Tallon, deceased Parent of 9/11 Decedent Sean Patrick Tallon	N/A
19	Wall, Diane	NJ	USA	Wall, Glen	Spouse	N/A
20	Welty, Delia	NY	USA	Welty, Timothy M.	Spouse	N/A
21	Welty, Delia	NY	USA	Welty, Timothy M.	Parent and legal guardian on behalf of J.W., minor child of 9/11 Decedent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
					Timothy M. Welty	
22	Welty, Jake	NY	USA	Welty, Timothy M.	Child	N/A
23	Wiswall, Patricia	MD	USA	Wiswall, David	Spouse	N/A
24	Zucker Heisler, Erica	NY	USA	Zucker, Andrew S.	Spouse	N/A
25	Zucker Heisler, Erica	NY	USA	Zucker, Andrew S.	Parent and legal guardian on behalf of J.Z., minor child of 9/11 Decedent Andrew S. Zucker	N/A

Dated: November 27, 2018

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler

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